

Exhibit 2

DECLARATION OF GEOFFREY ORLEY

I, Geoffrey Orley, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of 18. I am a businessman residing in the State of Michigan. I submit this declaration based upon my personal knowledge and upon discussions with my brother, who is also my business partner.

Introduction to Nicholas Genovese and Decision to Invest

2. I was introduced to Nicholas Genovese by a mutual friend who is a chiropractor in New York City. Before making my decision to invest in Mr. Genovese's fund, I had known him socially for approximately 45 days. Mr. Genovese told me that he had worked at Bear Stearns and that when that firm failed he had started his own fund, Willow Creek. At various times Mr. Genovese also told me that he had graduated from the University of Kentucky and the Dartmouth Tuck School of Business and that he had worked at Goldman Sachs.

3. Mr. Genovese told me that when he left Bear Stearns he took along with him three traders who were Hasidic Jews and started his own firm.

4. Mr. Genovese told me that his fund was worth approximately \$30 billion and had investment returns of around 30% to 40% per year. He told me that he was part of the Genovese family that had owned a chain of drug stores in the New York area, and that they had sold the chain for approximately \$300 million. At the time I decided to invest, I performed an online search and found that there was in fact a Genovese family that had sold a drug store chain for a significant amount of money.

5. Mr. Genovese told me that his mother was an investor in the fund and that he always had to report to her about how the fund was doing. The fact that Mr. Genovese's mother was an investor was an important consideration for me.

6. My brother and I decided to invest, so we each invested \$1 million in approximately on November 24, 2015. According to statements we were able to view on Willow Creek's website, the fund was doing well and the value of our investment increased by 5 percent in the first month, so we decided to invest again, and added an additional \$1 million each between January 14 and January 20, 2016. At the time I made the decision to invest the second \$1 million I was vacationing with Mr. Genovese in Latin America and overheard him on the telephone discussing a successful investment that made him billions of dollars.

7. My brother and I invested in Willow Creek's Fund 1, which was supposed to be a more conservative option.

8. At the time of our investment we were not provided with a PPM, but we requested one and subsequently received a copy of a PPM dated April 2016.

9. In approximately September 2016 my brother requested redemption of \$1 million out of his account, which he received. Over time our account statements showed an increase in value. At the present time the value of my account is stated to be approximately \$3.1 million.

10. Last year, my brother and I both paid Federal income tax on the gains reported for our accounts.

Discovery of Information About Nicholas Genovese and Request for Redemption

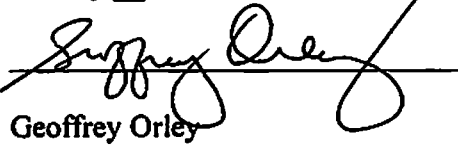
11. In approximately May 2017, another investor in Willow Creek placed a telephone call to me and told me that he had learned that Nicholas Genovese had a criminal history. I found this information to be very disturbing. At the same time, my brother and I felt the need to increase our liquidity in order to pursue other opportunities, so in May 2017 we requested a complete redemption of our funds.

12. To date, Willow Creek and Mr. Genovese have failed to redeem our investments. I have contacted Mr. Genovese repeatedly to ask for our funds. Mr. Genovese explained that there is a procedure to follow to withdraw funds, and that this takes time.

13. The time periods set out in the PPM have now passed and we have renewed our demand to withdraw our funds. However, Mr. Genovese has recently told me that he cannot easily liquidate the positions we hold, and that he has to wait until the “stars are aligned” to do so or there is a risk that 95% of our money could be lost. My brother and I are very concerned about the return of our investments.

I declare under penalty of perjury (under the laws of the United States of America) that the foregoing is true and correct.

January 31, 2018


Geoffrey Orley